

# #1

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, March 23, 2023 12:56:24 PM  
**Last Modified:** Thursday, March 23, 2023 1:35:34 PM  
**Time Spent:** 00:39:10  
**IP Address:** 73.65.253.145

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## Q1

Contact information:

**Name:** Dan MacNulty  
**City/Town:** Logan  
**State/Province:** UT  
**Email Address:** dan.macnulty@usu.edu

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## Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

Dear FWP and F&W Commission,

The rationale of the proposed amendment to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means) is not clear. FWP's Coversheet explains that "any specific ARM reference to the first (current) wolf plan should be edited to represent the reality of plan evolution over time." However, the text of ARM 12.9.1303 does not actually reference a "first" or "current" wolf plan; it only references "the Montana Gray Wolf Conservation Management Plan" as copied below. Further explanation is therefore necessary to understand why FWP and the Commission seek to amend ARM 12.9.1303.

Thank you for the opportunity to comment.

Dan MacNulty  
Logan, Utah

### 12.9.1303 CONTROL METHODS OF THE GRAY WOLF INCLUDE NONLETHAL AND LETHAL MEANS

(1) These rules address when and how the department may carry out nonlethal and lethal control of wolves.

(2) To undertake control actions that are consistent with this rule and the Montana Gray Wolf Conservation and Management Plan, the department may:

(a) take control actions;

(b) authorize USDA Wildlife Services pursuant to an interagency cooperative agreement;

(c) authorize the Department of Livestock pursuant to an interagency cooperative agreement; or

(d) issue permits to individuals pursuant to ARM 12.9.1305.

(3) The department is responsible for the status, conservation, and management of the gray wolf population as a state species in need of management, game animal, or a furbearer as guided by the Montana Gray Wolf Management Plan, administrative rules, and statutes.

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## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, March 23, 2023 4:35:54 PM  
**Last Modified:** Thursday, March 23, 2023 4:50:54 PM  
**Time Spent:** 00:14:59  
**IP Address:** 24.252.175.98

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### Q1

Contact information:

Name:	<b>Jim Cik</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>extraslo@gmail.com</b>

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### Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

I am in favor of serialization of as many wolves as possible. But if you had to shoot them, I am good with that.

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# #3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, March 24, 2023 6:18:23 AM  
**Last Modified:** Friday, March 24, 2023 6:21:13 AM  
**Time Spent:** 00:02:49  
**IP Address:** 216.47.48.154

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## Q1

Contact information:

Name: **Timothy Mitchell**  
City/Town: **St. Ignatius**  
State/Province: **MT**  
Email Address: **sti2866@blackfoot.net**

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## Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

stay with lethal control,

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## #4

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, March 24, 2023 9:49:41 AM  
**Last Modified:** Friday, March 24, 2023 10:13:11 AM  
**Time Spent:** 00:23:30  
**IP Address:** 174.234.0.140

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### Q1

Contact information:

**Name:** James Cox  
**City/Town:** Brady  
**State/Province:** MT  
**Email Address:** ocox@3rivers.net

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### Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

I strongly agree with a lethal means of control of Gray wolf's. We will always need a good predator control program, wether it be hunting, trapping,or snaring. I strongly believe you need to work with the sportsman's as we put the most time and \$\$\$ to fwp and conservation. Thank you for your time and consideration. James

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## #5

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, March 26, 2023 12:38:42 AM  
**Last Modified:** Sunday, March 26, 2023 12:42:37 AM  
**Time Spent:** 00:03:54  
**IP Address:** 172.56.48.126

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### Q1

Contact information:

Name: **Jared Engberg**  
City/Town: **anaconda**  
State/Province: **MT**  
Email Address: **jengberg07@yahoo.com**

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### Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

Trapping of wolves is a significant risk to my dogs! I don't even bring them into the mountains anymore. The wolf hunting agenda over the past few years outrages me more than anything else I can think of. This state is run by criminals now, what a sad time to be a Montanan.

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## #6

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, March 26, 2023 4:00:16 PM  
**Last Modified:** Sunday, March 26, 2023 4:25:03 PM  
**Time Spent:** 00:24:46  
**IP Address:** 184.166.226.156

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### Q1

Contact information:

Name: **Thomas McNamee**  
City/Town: **Livingston**  
State/Province: **MT**  
Email Address: **ctm-3@outlook.com**

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### Q2

Please comment on the Amendments to Administrative Rule of Montana (ARM) 12.9.1303 (Control Methods of the Gray Wolf Include Nonlethal and Lethal Means).

Thank you for this opportunity to comment.

There are two areas of ARM 12.9.1303 I would like to address, of which the relevant portions I quote here:

1) "A landowner or landowner agent, pursuant to 87-1-901, MCA, may take a wolf on the landowner's property without permit or license when the wolf is a potential threat as defined in ARM 12.9.1302 . . .

'Potential threat' means those wolves in immediate proximity to human dwellings, livestock, or domestic dogs."

"Immediate proximity" is unnecessarily vague. It should be defined in terms of distance.

2) "For game management purposes, the commission may apply different management techniques depending on the conditions in each administrative region with the most liberal harvest regulations applied in regions with the greatest number of wolves. In doing so, the commission may authorize: . . . the trapping or snaring of more than one wolf by the holder of a trapping license . . . the harvest of an unlimited number of wolves by the holder of a single wolf hunting or wolf trapping license; . . . during the wolf trapping season, the use of bait while hunting or trapping wolves as long as no trap or snare trap is set within 30 feet of exposed bait visible from above; and . . . the hunting of wolves on private lands outside of daylight hours with the use of artificial light or night vision scopes."

These methods of "taking" wolves are barbaric, offensive, immoral, and entirely unnecessary. They have already made Montana a shame in the nation. They are based only on hatred and revulsion, not on fair chase, effective control, or any other principle of decency. They are not wildlife management, they are vicious slaughter. I urge you, if the hunting of wolves is necessary at all, to apply the principles of fair chase--as is done with every other game animal in Montana.

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